

RECEIVED & INDEXED  
MAR 14 2003  
FCC - MAILROOM

# DU-COMM

*DuPage Public Safety Communications*

Bartlett/Countryside Fire  
Protection District

Bartlett Police Department

Carol Stream Fire  
Protection District

Carol Stream Police  
Department

Elmhurst Fire Department

Elmhurst Police Department

Glen Ellyn Fire Company

Glen Ellyn Police Department

Glenside Fire Protection District

Hanover Park Fire Department

Hanover Park Police Department

Lisle-Woodridge Fire  
Protection District

Lombard Fire Department

Lombard Police Department

Oakbrook Terrace Fire  
Protection District

Oakbrook Terrace Police  
Department

Villa Park Fire Department

Villa Park Police Department

Warrenville Fire Protection  
District

Warrenville Police Department

West Chicago Fire  
Protection District

West Chicago Police Department

Wheaton Fire Department

Wheaton Police Department

Winfield Fire Protection District

Winfield Police Department

York Center Fire Protection District

Yorkfield Fire Protection District

600 Wall Street  
Glendale Heights, IL 60139-1900  
(630) 260-7500  
(630) 924-9280 **FAX**

George P. Longmeyer  
*Director*

February 25, 2003

Federal Communications Commission  
Washington D.C. 20554

In the matter of ET Docket No. 02-380

DuPage Public Safety Communications, (DU-COMM) a consolidated Public Safety 9-1-1 center, located in Dupage County Illinois west of Chicago. has reviewed the FCC's proposed docket and files the following comments.

We oppose the use of unlicensed devices in the public safety frequency areas due to the use of unlicensed devices creates a potential for serious interference to existing licensed operations especially the potential of causing harmful interference to Police, Fire, and EMS services.

**As** a unit of local government, we serve twelve police and fifteen fire departments on twelve 470-512 Mhz frequencies that serve approximately 700,000 residents. Due to frequency congestion in the Chicago area, many Police agencies in the DuPage, Cook, Kane, and Lake Counties are licensed on the 470-512 Mhz band. Since 9/11, the importance of these departments to have clear channels for interoperability is critically important.

**A** key problem with the proposal is that unlicensed use cannot easily be confined to a particular geographic area. Thus, for example, an unlicensed device might be able to operate freely on channel 14 (470-476 MHz) in Arizona, but if moved to DuPage County Illinois, could create serious interference to public safety and other land mobile radio systems operating there.

No. 02-380-014  
Liaison  
044



The Commission also inquires as to whether unlicensed devices could be designed to “hear” other signals and shut down if there is a potential for interference. This involves still-developing technology and does not provide the level of comfort needed to assure Public Safety Officials of the communications needed during man made or natural disasters.

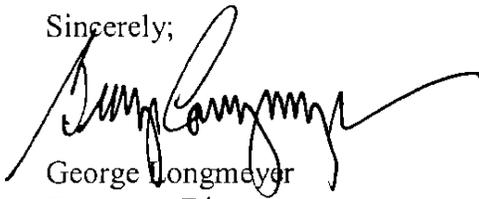
Our technical staff spends one week out of every three months to track and remediate interference problems to DU-COMM’s licensed frequencies. Upon request, we assist other Public safety agencies in Suburban Chicago with interference issues. Due to the portability of unlicensed devices, detection and tracking could prove extremely difficult.

DU-COMM holds the following licenses on the 470-512 Mhz bands, WPTK582, WPUV475, and KZA347.

Due to the growth of the suburban Chicago metropolitan area, additional frequencies will be needed in the near future. The newly authorized 750Mhz public safety band falls within the 614-806 Mhz “TV band” and under this proposal the potential for serious interference to new licensees and state wide trunking systems is great. The State of Illinois is in the process of building the “STARCOM 21” 800 Mhz network and will integrate 750 Mhz channels. DU-COMM along with the City of Chicago and State of Illinois are working with the Region 54 coordinator on channel band plan for the 750 Mhz band.

In summary DU-COMM opposes the use of unlicensed devices in the two “tv bands” since it is a major licensed user in the 470-512 Mhz band in DuPage County and plans future operations on 750 Mhz in the 614-806 Mhz band.

Sincerely;



George Longmeyer  
Executive Director